



JuanB Perez/DC/USEPA/US

05/30/2007 09:55 AM

To NCIC HPV@EPA

cc

bcc

Subject Fw: HPV challenge program

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201-16594

----- Forwarded by JuanB Perez/DC/USEPA/US on 05/30/2007 09:55 AM -----



"Deyo, James A"

<deyo@eastman.com>

05/29/2007 04:31 PM

To NCIC OPPT@EPA, Rtk Chem@EPA

cc

Subject HPV challenge program

Dear Administrator,

Please see the attached letter and test plan, both of which are also being sent as hard copies by the mail. Briefly, Eastman would like to retroactively be credited with sponsoring a CAS number for a chemical listed on the 1994 IUR report whose data was used to support a CAS number on the 1990 HPV list. Both CAS numbers represent the same chemical, dimethyl-1,4-cyclohexanedicarboxylate, as it exist in a mixture of cis and trans forms and as a pure trans isomer.

<<EPA-DMCD both CAS.pdf>> <<Test plan and sum for both DMCD CAS no.pdf>>

James A. Deyo D.V.M., Ph.D., D.A.B.T.
Prod. Safety & Health - Toxicologist
Eastman Chemical Company
100 North Eastman Road
Kingsport, TN 37662
Ph: 423-229-5208
Fax: 423-224-0208
deyo@eastman.com



EPA-DMCD both CAS.pdf



Test plan and sum for both DMCD CAS no.pdf

EASTMAN

Eastman Chemical Company
P.O. Box 511
Kingsport, Tennessee 37662

May 29, 2007

201-16594

Mr. Steve Johnson, Administrator
US EPA
PO Box 1473
Merrifield, VA 22116

Attn: Chemical Right-to-Know Program

RE: HPV Chemical Challenge Program, AR-201

Dear Mr. Johnson:

On November 24th, 1999 the Eastman Chemical Company volunteered to sponsor Dimethyl-1,4-cyclohexanedicarboxylate (DMCD; CAS No.: 94-60-0) into the US-HPV Challenge Program. This commitment was followed up with submission of a test plan and robust summaries on June 17th, 2003.

CAS number 94-60-0 actually consists of a mixture of both the *cis*- and *trans*- isomers of DMCD. The test plan Eastman submitted on this CAS number contained studies carried out on CAS No. 94-60-0 as well as on CAS No. 3399-22-2 which represents the *trans* isomer form. In addition, the plan included data on the anticipated primary metabolite 1,4-cyclohexanedicarboxylic acid (CAS No. 1076-97-7).

The EPA reviewed these data and concluded there to be no need for any more testing to fulfill the various environmental and human health endpoints. Eastman sent in a revised test plan on November 14th, 2003 to address some detail deficiencies in the test plan and robust summaries to complete the process.

CAS number 3399-22-2 was not listed on the 1990 IUR list of HPV chemicals to be sponsored. However, it was included on the 1994 list of HPV chemicals that was provided by the Agency for use by companies who desire to propose categories of chemicals for testing and wish to include and sponsor chemicals from the 1994 list in their category definitions. Although Eastman used this CAS number to support our original submission on DMCD (CAS no. 94-60-0), we were not aware that it was present on the 1994 IUR list available for sponsorship. Therefore, by way of this letter, Eastman would like to request that the EPA retroactively fully credit Eastman Chemical Company with supporting CAS number 3399-22-2 as part of our original submission on CAS number 94-60-0. Since both CAS numbers represent the same chemical and all data for both CAS numbers were included in our original submission the sponsorship of CAS No. 3399-22-2 (*trans*-DMCD) will not require the development of any new robust summaries or changes to the summaries already reviewed. However, I have slightly modified the test plan to show 3399-22-2 is now an officially sponsored chemical and that DMCD is represented by two CAS numbers. This revised test plan is include as an attachment.

The HPV registration number for Eastman Chemical is _____. Please call me at 423-229-5208 if you have any questions.

Sincerely,

James A. Deyo D.V.M., Ph.D., D.A.B.T.
Senior Associate



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A Public Commitment

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